

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>  
Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Related D.I. No. 30432, 30898

**Hearing Date: August 12, 2025 at 9:30 am (ET)**

**Objection Deadline: August 5, 2025 at 4:00 pm (ET)**

**AMENDED MOTION TO EXTEND TIME TO COMPLETE KYC REQUIREMENTS AS  
TO MORGAN & MORGAN P.A. CLIENTS WHO ARE BONE FIDE FTX CUSTOMERS**

Gellert Seitz Busenkell & Brown LLC (“GSBB”) and Morgan & Morgan, P.A. (“M&M” and collectively with GSBB, “Counsel”), counsel to those individuals identified on Exhibit A (collectively, the “M&M FTX Customers” or “M&M Group of FTX Clients”) <sup>2</sup> annexed hereto, hereby files this motion requesting an extension of time to enable M&M FTX Customers to fully resolve pending outstanding issues, including but not limited to completion of KYC requirements, which is otherwise subject to a June 1, 2025 claims bar deadline, pursuant to Rule 60(b) of the Federal Rules of Civil Procedure, incorporated into chapter 11 proceedings by Bankruptcy Rule 9024, and respectfully states as follows:

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Counsel does not represent the M&M FTX Customers as a “committee” or a “group” (as such terms are used in the Bankruptcy Code and the Bankruptcy Rules). Rather, Counsel has combined its clients into a group for purposes of addressing the instant motion.

1. Each and every M&M FTX Customer has individually retained Morgan & Morgan to represent him or her as counsel in connection with claims asserted in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), and in connection with that certain adversary proceeding pending in the Chapter 11 Cases, captioned *In re: FTX Trading Ltd., et al.*, Adv. Pro. No. 25-50962-KBO (the “M&M Adversary Proceeding”).

2. For purposes of the Chapter 11 Cases and the M&M Adversary Proceeding, Counsel represents each M&M FTX Customer in their individual capacity.

3. The name of each M&M FTX Customer whose interest may be adversely impacted by the outcome of the instant motion, together with the disclosable economic interests held by each of them in relation to the Chapter 11 Cases, is set forth in Exhibit A, attached hereto, and incorporated by reference herein. A Declaration of Benjamin Webster, confirming the engagement of said clients by Counsel, is attached hereto, and incorporated by reference herein, as Exhibit B<sup>3</sup>.

4. M&M FTX Customers listed on Exhibit A tried but were unable to complete the requirements of the court order setting forth the June 1, 2025 claims bar deadline to comply with the KYC requirements, due to technical issues that tech support for FTX could not resolve. Said efforts are memorialized in the Declaration of Paityn Nelson, attached hereto, and incorporated by reference herein, as Exhibit C.

5. Under Fed. R. Bankr. P. 9013-1, the Bankruptcy Court may, upon motion, grant an extension or enlargement of time to allow for claimants to fully resolve any and all outstanding issues regarding their respective, timely submitted claims.

6. Counsel’s team has spent numerous hours via phone and email corresponding with M&M FTX Customers to assist in finding a solution to the various problems they have faced

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<sup>3</sup> Counsel has similarly filed a verified Rule 2019 Statement listing the identities of all clients in relation to the above referenced matter.

(including, but not limited to, log in issues, verifying their identity, complying with KYC requirements, inaccurate claim amount, and/or claim amount showing up as disputed, etc.).

7. In addition, Counsel's team has also spent countless hours corresponding with FTX Support via [support@ftx.com](mailto:support@ftx.com) to assist M&M FTX Customers in finding a solution to the various problems they have faced.

8. At least as far back as October 2024, counsel's team has been communicating regularly with Debtor's counsel regarding questions and concerns about M&M FTX Customers' claims, after making insufficient progress with the FTX bankruptcy administrators (Kroll) regarding same.

9. While counsel for Debtors has worked to assist Counsel in resolving outstanding M&M FTX Customer issues, counsel for Debtors has thus far refused to provide Counsel with much needed pertinent information, specifically, a list of our clients who have received distributions, and the date and amount of same, compounding exponentially the challenge for Counsel in navigating its representation of over 300 clients vis-à-vis the above referenced matter.

10. In an abundance of caution, in light of the above, Counsel has also included within **Exhibit A** M&M FTX Customers that: (1) have disputed claims, as per FTX, that were being looked into by counsel for Debtor; (2) have not been responsive since engaging Counsel to represent them with their respective individual claims, as Counsel has not fully determined the cause of same, which could very well be, among other things, simply due to a change of phone number and/or email or mailing address; and/or (3) have some other issue re representation by Counsel.

11. An indefinite extension of the June 1, 2025 claims bar deadline to enable Counsel to continue working with Debtor's counsel to resolve all pending outstanding issues, including

compliance with the KYC requirements, is reasonable and appropriate considering M&M FTX Customers have been unable to complete the KYC requirements and comply with the June 1, 2025 because of technical issues that FTX tech support could not resolve and/or because Counsel has not been provided pertinent information from FTX, notwithstanding its request for same.

12. Moreover, it would not be an undue burden to the FTX bankruptcy estate to allow for said extension of time, as the total amount of claims at issue, with respect to M&M FTX Customers who have faced difficulties in resolving issues, is less than a thousandth of one percent of the total amount of claims of all claimants in the instant proceedings.

WHEREFORE, Movant requests an extension of time, thereby extending the June 1, 2025 deadline re KYC compliance, etc., indefinitely, to provide additional time for Counsel to continue working with Debtor's counsel to resolve all outstanding, pending issues, and for such further relief as the Court deems appropriate

*[Remainder of page intentionally left blank]*

Dated: July 29, 2025

GELLERT SEITZ BUSENKELL & BROWN, LLC

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